



STATEMENT OF WORK  
FOR  
FOCUSED REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
RICHARDSON FLAT TAILINGS SITE  
SUMMIT COUNTY, UTAH  
UT980952840

## INTRODUCTION

United Park City Mines Company ("United Park") submits this Statement of Work ("SOW") to perform a focused remedial investigation/feasibility study at the Richardson Flat Tailings Site, located in Summit County, Utah (the "Site"). In support of this SOW, United Park has prepared a Focused Remedial Investigation/Feasibility Study Work Plan (the "Focused RI/FS Work Plan"), which is attached hereto as Exhibit A and incorporated by reference to this SOW. At the request of United States Environmental Protection Agency ("EPA") Region 8, this SOW has been prepared based on and in conformance with EPA's July 2, 1991 Model Statement of Work for PRP-Conducted Remedial Investigations and Feasibility Studies (EPA's "Model SOW"). This work is being conducted in full cooperation with both the EPA and the Utah Department of Environmental Quality (UDEQ).

As described in Section 1.0 of the Focused RI/FS Work Plan, United Park is the current owner of a large parcel of property (the "Property"), comprising approximately 700 acres, located in Summit County, Utah. Figure 1.0 of the Focused RI/FS Work Plan shows the general geographic location of the Property. A historic mine tailings impoundment, consisting of a large, geometrically closed basin formed by an earth embankment and a series of perimeter containment dikes, covers approximately 160 acres of the Property and is sometimes referred to as "Richardson Flat" or simply the "Site." The tailings impoundment resulted from decades of mining and milling silver-laden ore in the area around Park City known as the Park City Mining District. The Site is depicted in Figure 2.0 of the Focused RI/FS Work Plan.

The Site has remained unused since mining and milling operations ceased in 1982. Over the past fifteen years, EPA Region 8, the Utah Department of Environmental Quality ("UDEQ") and United Park have been investigating the Site in order to characterize the Site and determine potential adverse impacts to human health and the environment associated with the Site. At the same time, United Park has been implementing a series of remedial measures at the Site intended to mitigate any potential adverse impacts on human health and the environment.

The objectives of this focused remedial investigation/feasibility study ("RI/FS") are to further investigate the nature and extent of contamination at the Site, to supplement the

investigation efforts performed at the Site to date, to collect sufficient data to support EPA's risk assessment and analysis, and, if necessary, develop and evaluate potential additional remedial alternatives to support final Site closure. The focused RI and FS are interactive and may be conducted concurrently so that the additional data collected in the focused RI influences the development of additional remedial alternatives in the FS, which in turn affects the data needs and the scope of treatability studies, if any are required.

United Park will conduct this focused RI/FS (except for the focused risk assessment component and any community involvement activities which will be conducted by the EPA and UDEQ) and will produce a draft RI/FS report that are in accordance with this SOW, and to the extent appropriate for the Site, the Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA (U.S. EPA, Office of Emergency and Remedial Response, October 1988), and any other guidance that EPA uses in conducting a RI/FS (a list of the primary guidance is attached), as well as any additional requirements in the administrative order. United Park will furnish all necessary personnel, materials, and services needed, or incidental to, performing the focused RI/FS, except as otherwise specified in the administrative order.

At the completion of the focused RI/FS, EPA in consultation with UDEQ will be responsible for the selection of a site remedy and will document this selection in a Record of Decision (ROD). The remedial action alternative selected by EPA in consultation with UDEQ will meet the cleanup standards specified in CERCLA Section 121. That is, the selected remedial action will be protective of human health and the environment, will be in compliance with, or include a waiver of, applicable or relevant and appropriate requirements of other laws, will be cost-effective, will utilize permanent solutions and alternative treatment technologies or resource recovery technologies, to the maximum extent practicable, and will address the statutory preference for treatment as a principal element, as appropriate for the Site. The final focused RI/FS report, as adopted by EPA in consultation with UDEQ and EPA's focused risk assessment will, with the administrative record, form the basis for the selection of the Site's final closure remedy and will provide the information necessary to support the development of the ROD.

As specified in CERCLA Section 104(a)(1), as amended by SARA, EPA will provide oversight of United Park's activities throughout the focused RI/FS. United Park will support EPA's initiation and conduct of activities related to the implementation of oversight activities.

## TASK 1 - SCOPING

As described in Section 3 of the Focused RI/FS Work Plan, since the 1970s, numerous environmental investigations have been conducted relating to the Site. The reports and data from these prior investigations are very useful in determining the scope of additional investigative activities needed to bring final closure to the Site. From 1985 to 1988 and from 1992 to 1993, the EPA conducted and reported on investigations at the Site. Based on previous and current environmental studies and existing Site conditions, United Park has developed a conceptual model of the Site. As described in Section 4 of the Focused RI/FS Work Plan, the Preliminary Site Model will be used to scope and evaluate the need for supplemental remedial investigation work (as described in Section 5 of the Focused RI/FS Work Plan) to assist in the development of further remedial measures to support final Site closure. United Park will develop a Preliminary Site Model in coordination with EPA and UDEQ.

As described in the Focused RI/FS Work Plan, the Site is similar in construction and characteristics to other tailings impoundment's found throughout Utah and other Rocky Mountain States. The tailings on this Site are non-reactive and were derived from ore bodies contained in carbonate host rocks. Soil, surface water, and groundwater media will be addressed in both the additional investigative work and in the evaluation of further remedial measures as part of the RI/FS work to be performed pursuant to this SOW. Recent and past investigations show that the tailings are underlain by native high-clay-content soils, sitting within an enclosure constituting a large, geometrically closed impoundment, covered with a vegetated soil cover. There is a surface water diversion ditch system that surrounds the impounded tailings. Because the characteristics of the Site are similar to other tailings impoundment's in the Rocky Mountain region, much is known about such sites generally and about the effectiveness of such an impoundment's construction. Such information will also be very useful in determining the scope of additional investigative activities needed to bring final closure to the Site.

When scoping the specific aspects of a project, United Park will meet with EPA and UDEQ to discuss all project planning decisions and special concerns associated with the Site. As a function of the project planning process, United Park will perform the activities described below to the extent they have not already been performed.

### a. Site Background and Site Visit

The respondent will gather and analyze the existing site background information and will conduct a site visit to assist in planning the scope of the RI/FS. The respondent will also

collect and analyze existing data and document the need for additional data. Before planning RI/FS activities, all existing site data will be thoroughly compiled and reviewed by the respondent. Specifically, this will include presently available data relating to the varieties and quantities of hazardous substances at the site, and past disposal practices. This will also include results from any previous sampling events that may have been conducted. This information will be utilized in determining additional data needed to characterize the site, better define potential applicable or relevant and appropriate requirements (ARARs), and develop a range of preliminarily identified remedial alternatives.

The respondent will also conduct a site visit during the project scoping phase to assist in developing a conceptual understanding of sources and areas of contamination, as well as potential exposure pathways and receptors at the site. This information will be utilized to better scope the project and to determine the extent of additional data necessary to characterize the site, better define potential ARARs, and narrow the range of preliminarily identified remedial alternatives.

Consistent with EPA's Model SOW, United Park has gathered and analyzed the existing Site background information and has conducted numerous Site visits to assist in scoping its focused RI/FS. The results of these efforts are reported in Sections 2, 3 and 4 of the Focused RI/FS Work Plan. This information was utilized in determining additional data needed to characterize the Site, and will assist to better define potential ARARs and develop a range of preliminarily identified additional remedial alternatives. The results of these efforts are reported in Sections 5 and 7 of the Focused RI/FS Work Plan. In addition, United Park has conducted site visits with personnel from the EPA and UDEQ. The Site work completed from 1985 to 1993 by EPA and UDEQ has provided a great deal of background information on the Site. There is a good deal of institutional knowledge about the Site.

#### b. Project Planning

Once the respondent has collected and analyzed existing data and conducted a site visit, the specific project scope will be planned. Project planning activities include those tasks described below, as well as identifying data needs, developing a work plan, designing a data collection program, and identifying health and safety protocols.

As described in the Focused RI/FS Work Plan, United Park has been implementing a series of remedial measures at the Site intended to mitigate any potential adverse impacts on human health and the environment. As the result of previous Site operations and United Park's remedial efforts, United Park believes that key elements are already in place to support final Site closure. These closure elements include:

- Installation of multiple monitoring wells to monitor groundwater conditions in and around the Site
- Construction of a large, earth embankment and a series of containment dikes to contain the tailings
- Construction of a diversion ditch system surrounding the impoundment to collect and redirect surface and ground water
- Placement of a vegetated clay soil cover to isolate the tailings, to prevent tailings from becoming wind-borne, and to minimize the infiltration of water to the tailings
- Installation of a security fence to limit Site access

Based on the data collected from and the remedial measures that have already been implemented at the Site to date, and in consideration of remedial measures implemented at similar tailings impoundment sites throughout Utah and other Rocky Mountain States, United Park believes that final Site closure can be achieved without the implementation of further remedial measures.

However, United Park recognizes that EPA has concerns about Site conditions that the agency believes must be addressed through additional Site characterization and possibly through the implementation of additional remedial measures. Therefore, United Park agrees to further investigate the nature and extent of contamination at the Site to supplement the investigation efforts performed at the Site to date and confirm that the measures implemented at the Site to date are adequate to support final closure of the Site. If necessary, based on the findings of these efforts, United Park will also develop and evaluate potential additional remedial alternatives to support a final closure of the Site that is protective of human health and the environment, and consistent with contemplated future land use of the Site. United Park proposes to use the data derived from the Focused RI/FS (together with a focused risk assessment to be performed by EPA) to determine whether any further remedial measures are needed to support final Site closure. If and to the extent further remedial measures are required, United Park believes that any appropriate final remedy for the Site should be consistent with and incorporate, to the maximum extent practicable, all elements of the existing Site closure.

If remedial actions involving treatment have been identified by the respondent or EPA, treatability studies will be required except where the respondent can demonstrate to EPA's satisfaction that they are not needed. Where treatability studies are needed, initial treatability testing activities (such as research and study design) will be planned to occur concurrently with site characterization activities.

As previously described in this SOW and in the Focused RI/FS Work Plan, United Park will develop and evaluate potential additional remedial alternatives to support a final closure of the Site that is protective of human health and the environment, and consistent with contemplated future land use of the Site. As described in Section 7.0 of the Focused RI/FS Work Plan, a preliminary list of such additional remedial measures may include:

- Improving and maintaining the main embankment stability and integrity
- Improving and maintaining the soil cover
- Improving and maintaining the surface drainage
- Improving and maintaining the diversion ditches
- Excavating tailings located outside of the impoundment, placing the same within the impoundment, and placement of additional cover
- Establishing appropriate institutional controls to prevent unacceptable exposure risk

At this time, such preliminary additional remedial measures would not involve treatment of hazardous wastes or substances. Consequently, it is unlikely that treatability studies would need to be performed as part of the evaluation and selection of final additional remedial measures to support final closure of the Site. However, if new information comes to light as a result of United Park's focused RI/FS efforts, or if circumstances change, then United Park will evaluate the need for and conduct, as necessary, treatability tests in accordance with the NCP and as approved by EPA.

The respondent will conduct a preliminary identification of potential state and federal ARARs (chemical-specific, location-specific and action-specific) to assist in the refinement of remedial action objectives, and the initial identification of further remedial alternatives and ARARs associated with particular actions. ARARs identification will continue as site conditions, contaminants, and remedial action alternatives are better defined.

As described in Sections 6.0 and 7.0 of the Focused RI/FS Work Plan, evaluation of any further remedial alternatives to support the final Site closure will include an assessment of the feasibility and overall effectiveness of such measures based on the requirements of CERCLA and the NCP. This will include a focused risk assessment (to be performed by EPA) that is based on possible future land use scenarios. At the outset of the focused feasibility study, ARARs for the final Site closure will be preliminarily identified. Since the range of possible future land uses will be set out early in the process, the proposed ARARs will be focused on a narrow range of remedial measures to support final Site closure. ARARs identification will continue as Site conditions, contaminants, and remedial action alternatives are better defined.

- c. Scoping Deliverables -- Focused RI/FS Work Plan, Sampling and Analysis Plan, and Health and Safety Plan.

According to EPA's Model SOW, at the conclusion of the project planning phase, the respondent will submit a RI/FS work plan, a sampling and analysis plan ("SAP"), and a site health and safety plan ("HASP"). The SAP provides a mechanism for planning field activities and consists of a field sampling plan (FSP) and a quality assurance project plan (QAPP). The FSP will define the sampling and data-gathering methods that will be used on the project. The QAPP will describe the project objectives and organization, functional activities, and quality assurance and quality control (QA/QC) protocols that will be used to achieve the desired data quality objectives ("DQOs"). The HASP will be prepared in conformance with the respondent's health and safety program, and in compliance with OSHA regulations and protocols. The RI/FS work plan and SAP must be reviewed and approved by EPA prior to the initiation of field activities. United Park and EPA will coordinate comments so that the SAP will include sampling and field procedures to be followed by EPA oversight contractors. This portion of the SAP will include procedures for EPA oversight sampling for both scheduled and unscheduled sampling events.

The Focused RI/FS Work Plan is attached to this SOW and will be deemed approved upon EPA's signature of the AOC. The Work Plan provides additional detail to the tasks set forth in this SOW where available. The Sampling and Analysis Plan, and Health and Safety Plan will be submitted to the agencies within 60 days of EPA's signing of the AOC.

The SAP will most likely be delivered initially addressing only certain specific aspects of the RI/FS. If additional data gathering needs for specific aspects of the RI/FS are identified, the SAP will be supplemented with the additional data gathering criteria.

As previously indicated in this SOW, United Park has prepared a Focused RI/FS Work Plan, attached hereto as Exhibit A. Within sixty (60) days of the effective date of the AOC, United Park will also prepare a SAP (which includes a FSP and QAPP) and HASP prior to conducting any supplemental fieldwork at the Site. Consistent with EPA's Model SOW, the Focused RI/FS Work Plan and SAP will be reviewed and approved by EPA prior to the initiation of field activities.

## TASK 2 - COMMUNITY RELATIONS

The development and implementation of community relations activities are the responsibility of EPA and UDEQ. Although implementation of the community relations plan is the responsibility of EPA and UDEQ, United Park may assist by providing information regarding

the Site's history, participating in public meetings, or by assisting in the preparation of fact sheets for distribution to the general public. United Park may establish a community information repository, at or near the Site, to house one copy of the administrative record. The extent of United Park's involvement in community relations activities is left to the discretion of the agencies. United Park's community relations responsibilities, if any, will be specified in the community relations plan. All community relations activities conducted by United Park will be subject to oversight by EPA.

### TASK 3 - SITE CHARACTERIZATION

#### a. Field Investigation

During this phase, the Focused RI/FS Work Plan, SAP, and HASP are implemented. As set forth in Section 5 of the Focused RI/FS Work Plan, the supplemental field investigation will include the gathering of additional data to further define site physical and biological characteristics, sources of contamination, and the nature and extent of contamination at the Site. United Park, in accordance with the Focused RI/FS Work Plan and SAP will perform these activities. United Park will initiate field support activities following approval of the Focused RI/FS Work Plan and SAP. Field support activities may include obtaining access to the site, scheduling, and procuring equipment, office space, laboratory services, and/or contractors, as appropriate. United Park will notify EPA and UDEQ at least two weeks prior to initiating field support activities, so that EPA may adequately schedule oversight tasks. United Park will also notify EPA and UDEQ in writing upon completion of field support activities. United Park shall complete initial fieldwork within seventeen (17) months of EPA approval or modification of the SAP.

#### b. Data Analysis

In accordance with the Focused RI/FS Work Plan, United Park will analyze and evaluate the existing and any newly-collected data to describe: (1) site physical and biological characteristics, (2) contaminant source characteristics, (3) nature and extent of contamination and (4) contaminant fate and transport. The RI data will be presented in a format (i.e., computer disc or equivalent) to facilitate EPA's preparation of the focused risk assessment. United Park shall agree to discuss and then collect any data gaps identified by the EPA that need to be filled in order to complete the focused risk assessment. (See "Guidance for Data Usability in Risk Assessment - OSWER Directive # 9285.7- 05 - October 1990.) Additionally, the data will be used in combination with the focused risk assessment to facilitate the implementation of any additional remedial measures that are deemed necessary for the Site through the Feasibility Study that follows.



#### c. Data Management Procedures

Information gathered during the supplemental Site characterization work will be consistently documented and adequately recorded by United Park in well-maintained field logs and laboratory reports. Field logs will be utilized to document observations, measurements, and significant events that have occurred during field activities. Laboratory reports will document sample custody, analytical responsibility, analytical results, nonconformity events, corrective measures and/or data deficiencies, and adherence to prescribed protocols. United Park will provide EPA with analytical data within forty-five (45) days of each sampling activity, in an electronic format showing the location, medium, and results. United Park will notify EPA when all pertinent data to be used in the Remedial Investigation report has been provided to EPA.

#### d. Remedial Investigation Report Deliverable

After completing the supplemental field sampling and analysis, a draft RI Report will be prepared and submitted by United Park to EPA and UDEQ for review and approval. This report will be submitted to EPA within seventy-five (75) days of United Park's notification to EPA that all data has been provided. The draft RI report will contain a Site characterization summary that will provide EPA with a preliminary reference for developing the focused risk assessment. The Site characterization summary will also be used by United Park to assist in confirming that the measures implemented at the Site to date are adequate to support final closure of the Site, and in evaluating the development and screening of further remedial alternatives and the refinement and identification of ARARs. The draft RI report shall summarize and evaluate results of past and recent field activities to characterize the Site, sources of contamination and the fate and transport of contaminants. United Park will refer to the RI/FS Guidance for an outline of the report format and contents. Following receipt of comments by EPA and, United Park will prepare and submit a final RI report within thirty (30) days, which satisfactorily addresses EPA and UDEQ comments.

### TASK 4 - TREATABILITY STUDIES

As described earlier in this SOW and in Section 7.0 of the Work Plan, United Park will develop, evaluate and recommend, as necessary, potential additional remedial alternatives to support a final closure of the Site that will be protective of human health and the environment, and consistent with the contemplated future land use of the Site. At this time, such additional remedial measures would not involve treatment of hazardous wastes or substances. Consequently, it is unlikely that treatability studies would need to be performed as part of the evaluation and selection of final additional remedial measures to support final closure of the Site. However, if new information comes to light as a result of United Park's focused RI/FS efforts, or

if circumstances change, then United Park will evaluate the need for and conduct, as necessary, treatability tests in accordance with the NCP and EPA's Model SOW and as approved by EPA. If such tests are necessary, the following deliverables will apply:

1. Identification of Candidate Technologies Memorandum.
2. Treatability Testing Statement of Work.
3. Treatability Testing Work Plan.
4. Treatability Study Sampling and Analysis Plan.
5. Treatability Study Site Health and Safety Plan.
6. Treatability Study Evaluation Report.

Because it is unclear whether or not treatability studies are necessary it is not appropriate to include timeframes at this time. These will be addressed when it is known whether or not treatability studies are necessary.

## **TASK 5 - DEVELOPMENT, SCREENING, AND ANALYSIS OF FURTHER REMEDIAL ALTERNATIVES**

As described in Section 7.0 of the Focused RI/FS Work Plan and previously in Task 1.b of this SOW, United Park believes that final Site closure can be achieved without the implementation of further remedial measures. However, United Park recognizes that EPA has concerns about Site conditions that the agency believes must be addressed through additional Site characterization and possibly through the implementation of additional remedial measures. Therefore, United Park agrees to further investigate the nature and extent of contamination at the Site to supplement the investigation efforts performed at the Site to date and confirm that the measures implemented at the Site to date are adequate to support final closure. United Park notes that it is currently considering long-term, non-residential land uses at the Site and the Property. While the Property outside the impoundment is already suitable for development, the Property is not currently being used for any productive purpose. United Park is considering developing the area outside of the actual impoundment for non-residential, recreational uses. United Park is also considering non-residential uses, consistent with the soil cover and any appropriate institutional controls, for the southern area of the tailings impoundment area itself.

Based on the findings of these additional investigation and evaluation efforts, United Park proposes to use the data derived from the Focused RI/FS (together with a focused risk assessment to be performed by EPA) to facilitate the determination of whether any further remedial measures are needed to support final Site closure. If necessary, as part of the focused feasibility study, United Park will develop appropriate remedial action objectives, and develop and evaluate potential additional remedial alternatives, to support a final closure of the Site that is protective of human health and the environment, taking into consideration the low-toxicity volume of the on-Site tailings materials, as well as remedial measures implemented at similar tailings impoundment sites throughout Utah and the Rocky Mountain States. If and to the extent further remedial measures are required, United Park believes that any appropriate final remedy for the Site should be consistent with and incorporate, to the maximum extent practicable, all elements of the existing Site closure, and with contemplated future land use of the Site.

United Park will develop and evaluate a range of appropriate further remedial alternatives to support final Site closure, concurrent with the RI Site characterization task. Based on EPA's focused risk assessment, United Park will review, and if necessary and appropriate for the Site: 1) modify the site-specific remedial action objectives; 2) develop general response actions for each medium of interest to satisfy the remedial action objectives; 3) identify areas or volumes of media to which general response actions may apply, taking into account requirements for protectiveness as identified in the remedial action objectives; 4) identify, screen and document technologies, if any, applicable to each general response action to eliminate those that cannot be implemented at the site; and 5) assemble and document further alternative remedial measures. Such remedial measures may include, for example, removal, treatment and containment of the on-Site tailings materials, as well as a "no-action" alternative. Within thirty (30) days of receipt of EPA's baseline risk assessment, United Park will submit a memorandum detailing Remedial Action Objectives.

United Park will conduct a detailed analysis of additional remedial alternatives to support final closure of the Site, which will consist of an analysis against a set of nine evaluation criteria to ensure that the selected additional remedial measures will be protective of human health and the environment; will be in compliance with, or include a waiver of, ARARS; will be cost-effective; will utilize permanent solutions and alternative treatment technologies, or resource recovery technologies, to the maximum extent practicable; and will address the statutory preference for treatment as a principal element (if appropriate). The evaluation criteria include: (1) overall protection of human health and the environment; (2) compliance with ARARS; (3) long-term effectiveness and permanence; (4) reduction of toxicity, mobility, or volume; (5) short-term effectiveness; (6) implementability; (7) cost; (8) state (or support agency) acceptance; and (9) community acceptance. (Note: criteria 8 and 9 may not be complete until comments on

the proposed plan are received. State and community concerns expressed during the RI/FS process will be considered as they are submitted or otherwise expressed.)

Within ninety (90) days of EPA's approval of the Memorandum detailing the development, screening, and analysis of alternatives, United Park will submit a draft FS report to EPA for review and approval. Once United Park has addressed EPA's comments, the final FS report may be bound with the final RI report. This report, as ultimately adopted or amended by EPA, provides a basis for remedy selection by EPA and documents the development and analysis of further remedial alternatives to support final closure of the Site. United Park will refer to the RI/FS Guidance for an outline of the report format and the required report content, as appropriate for the Site.

## REFERENCES FOR CITATION

The following list, although not comprehensive, comprises many of the regulations and guidance documents that apply to the RI/FS process:

The (revised) National Contingency Plan

"Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, " U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive No. 9355.3-01

"Interim Guidance on Potentially Responsible Party Participation in Remedial Investigation and Feasibility Studies," U.S. EPA, Office of Waste Programs Enforcement, Appendix A to OSWER Directive No. 9355.3-01.

"Guidance on Oversight of Potentially Responsible Party Remedial Investigations and Feasibility Studies," U.S. EPA, Office of Waste Programs Enforcement, OSWER Directive No. 9835.3

"A Compendium of Superfund Field Operations Methods," Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, EPA/540/P-87/001a, August 1987, OSWER Directive No. 9355.0-14.

"EPA NEIC Policies and Procedures Manual," May 1978, revised November 1984, EPA-330/9-78-001-R.

"Data Quality Objectives for Remedial Response Activities, " U.S. EPA, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, EPA/540/G-87/003, March 1987, OSWER Directive No. 9335.0-7B.

"Guidelines and Specifications for Preparing Quality Assurance Project Plans," U.S. EPA, Office of Research and Development, Cincinnati, OH, QAMS-004/80, December 29, 1980.

"Interim Guidelines and Specifications for Quality Assurance Project Plans," U.S. EPA, Office of Emergency and Remedial Response, QAMS-005/80, December 1980.

"Users Guide to the EPA Contract Laboratory," U.S. EPA, Sample Management Office, August 1982.

Interim Guidance with Applicable or Relevant and Appropriate Requirements,' U.S. EPA, OFFICE of Emergency and Remedial Response, July 9, 1987, OSWER Directive No. 9234.0-05.

"CERCLA Compliance with Other Laws Manual," Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, August 1988 (draft), OSWER Directive No. 9234.1-01 and -02.

"Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites," U.S. EPA, Office of Emergency and Remedial Response, (draft), OSWER Directive No. 9283.1-2.

"Draft Guidance on Superfund Decision Documents," U.S. EPA, Office of Emergency and Remedial Response, March 1988, OSWER Directive No. 9355.-02

"Risk Assessment Guidance for Superfund - Volume I Human Health Evaluation Manual (Part A), EPA/540/1-89/002

"Risk Assessment Guidance for Superfund - Volume II Environmental Evaluation Manual," March 1989, EPA/540/1-89/ 001

"Guidance for Data Usability in Risk Assessment," October, 1990, EPA/540/G-90/008

"Performance of Risk Assessments in Remedial Investigation/Feasibility Studies (RI/FSs) Conducted by Potentially Responsible Parties (PRPs)," August 28, 1990, OSWER Directive No.9835.15.

"Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions," April 22, 1991, OSWER Directive No. 9355.0-30.

"Health and Safety Requirements of Employed in Field Activities," U.S. EPA, Office of Emergency and Remedial Response, July 12, 1981, EPA Order No. 1440.2.

OSHA Regulations in 29 CFR 1910.120 (Federal Register 45654, December 19, 1986).

"Interim Guidance on Administrative Records for Selection of CERCLA Response Actions," U.S. EPA, Office of Waste Programs Enforcement, March 1,1989, OSWER Directive No. 9833.3A.

"Community Relations in Superfund: A Handbook," U.S. EPA, Office of Emergency and Remedial Response, June 1988, OSWER Directive No. 9230.0#3B.

"Community Relations During Enforcement Activities And Development of the Administrative Record," U.S. EPA, Office of Programs Enforcement, November 1988, OSWER Directive No. 9836.0-1a.